

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ADA “JUNE” ODELL,
*individually, and on behalf of all
others similarly situated,*

Plaintiff,

V.

CVS PHARMACY, INC.,

Defendant.

No. 1:22-cv-03318

Hon. Robert W. Gettleman

Magistrate Judge Hon. Heather K. McShain

AGREED MOTION FOR ENTRY OF CONFIDENTIALITY ORDER

Plaintiff Ada “June” Odell and Defendant CVS Pharmacy, Inc., by and through their attorneys, respectfully move for entry of their Agreed Confidentiality Order. In support thereof, the parties state as follows:

1. The parties have propounded written discovery on each other, and Plaintiff has propounded third-party discovery. In order to fully respond, certain sensitive, confidential, and/or proprietary information will be produced.

2. Given the sensitive, confidential, and/or proprietary nature of the information being disclosed during discovery, Defendant requires an order of confidentiality. Said proposed order has been circulated to and agreed to by each attorney of record. There is no objection to this Motion or to the order of confidentiality.

3. Contemporaneous with the filing of this Motion, a copy of the Proposed Order will be submitted to the proposed order e-mail box of Judge Heather K. McShain (Proposed_Order_McShain@ilnd.uscourts.gov) in clean and redline (MS Word) against the Court's model order (additions are underlined and deletions are stricken).

Dated: September 18, 2023

Respectfully Submitted,

/s/ Matthew C. Wolfe

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 18, 2023 the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

/s/ Gary M. Klinger

Gary M. Klinger